

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

Tatiana Moisseenkova,	)	
	)	
Plaintiff,	)	Case No.
v.	)	
	)	<b>NOTICE OF REMOVAL</b>
Northland Group, Inc.,	)	
	)	
Defendant.	)	
_____	)	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the above-entitled action has been removed to Federal Court by Defendant Northland Group, Inc. ("Northland"), based upon the following grounds:

I.

An action has been commenced in the Civil Court of the City of New York, County of Kings, State of New York, entitled "*Tatiana Moisseenkova v. Northland Group, Inc.*", Case No 013699. The Summons and Complaint were mailed to and received by Northland on or about August 29, 2016. Copies of the Summons and Complaint are attached hereto as Exhibit A. Service upon Northland of the Summons and Complaint represents Northland's first receipt of a copy of the initial pleading setting forth the claim for relief on which this action is based.

II.

The above-described action is a civil action of which this Court has original jurisdiction under the provisions of Title 28, United States Code, §1331, and is one which

may be removed to this Court by the Defendant, in that it is a civil action “arising under the Constitution, laws, or treaties of the United States”. Plaintiff Tatiana Moisseenkova has asserted in her Complaint, a violation of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. Sec. § 1692 *et seq.*

Pursuant to 28 U.S.C. § 1446, this state court action may be removed to the United States District Court for the District of New York on the following grounds:

1. This is a civil action in which Plaintiff seeks relief under the laws of the United States, particularly the FDCPA, 15 U.S.C. Sec. § 1692 *et seq.* Therefore, the action “aris[es] under the Constitution, laws or treaties of the United States”.

2. This Notice of Removal is filed with this Court within 30 days after the receipt by Northland, by service or otherwise, of a copy of the initial pleading setting forth the claim for relief on which Plaintiff’s action is based.

3. Proper notice will be given to Plaintiff and the other parties, by and through their counsel of record, and the Clerk of the Civil Court of the City of New York, County of Kings, State of New York, a true and correct copy of such notice is attached hereto as Exhibit B.

Dated this 19<sup>th</sup> day of September, 2016.

Respectfully submitted,

**BLANK ROME LLP**

By: /s /Jonathan M. Robbin

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2016, a true and correct copy of the foregoing and/or attached instrument was served on all parties of record through the Eastern District of New York's CM/ECF E-filing System, and by first class mail as indicated below:

Daniel Kohn  
Revaz Chachanashvili Law Group, PLLC  
Attorney for Plaintiff  
285 Passaic Street  
Hackensack, NJ 07601  
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/s /Jonathan M. Robbin  
Jonathan M. Robbin